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## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 13, 2022

## **By ECF**

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Ahmed Mohammed El Gammal,

15 Cr. 588 (ER)

Dear Judge Ramos:

The Government writes respectfully with the consent of defense counsel to request an adjournment of the Government's current June 15, 2022 deadline to respond to the defendant's motion filed pursuant to 28 U.S.C. § 2255. The Government requires additional time to review and analyze the defendant's several claims, including those that relate to previously sealed and *ex parte* portions of the trial transcript that the Government had not reviewed prior to the filing of the defendant's motion. Accordingly, the Government requests that its deadline to respond to the defendant's motion be extended until July 1, 2022.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

by: <u>/S/</u>

Negar Tekeei Andrew DeFilippis Assistant United States Attorneys (212) 637-2231//2482

cc: Counsel of record (via ECF)